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February 23, 2016

**VIA ELECTRONIC REQUEST**

Regional Freedom of Information Officer  
U.S. EPA, Region 9  
75 Hawthorne Street (OPPA-2)  
San Francisco, CA 94105  
Fax: (415) 947-3591

**Re: Freedom of Information Act Request**

**Dannielle Ann Polakow et al. vs. Brenntag North America, et al.**

LASC Case No. BC599542/JCCP4674

Our Client: Revlon, Inc. ("Revlon")

Dear Custodian of Records:

We are requesting the disclosure of the following records pursuant to the Freedom of Information Act (5 USCS § 552), within the next twenty business days. All requested records pertain to the following locations:

- **Motion Picture Assoc. of America - 15301 Ventura Blvd, Bldg. E, Sherman Oaks, CA**
- **Coldwell Banker - 10324 Balboa Blvd., Granada Hills, CA 91344**
- **Quinn Martin Productions/Warner Studios - 5800 Sunset Blvd., Hollywood, CA**
- **Edit Rite - 1213 N. Highland Ave., Los Angeles, CA 90038**
- **Diversified Medical - 13928 Chandler Blvd, Sherman Oaks, CA 91401**
- **The Broadway, Topanga Plaza - 21900 Vanowen St., Canoga Park, CA 91304**
- **Century 21 - 9024 Balboa Blvd., Northridge, CA 91325**
- **Century 21 - 15334 Chatsworth St., Mission Hills, CA 91345**
- **University of California, Los Angeles (UCLA) Extension -  
10995 Le Conte Ave., Los Angeles, CA 90024;  
1010 Westwood Blvd., Los Angeles, CA 90024;  
1145 Gayley Ave., Los Angeles, CA 90024;  
261 S. Figueroa St., Los Angeles, CA 90012**
- **California State University Northridge - 18111 Nordhoff St., Northridge, CA 91330**
- **Granada Hills High School - 10535 Zelzah Ave., Granada Hills, CA 91344**
- **Granada Elementary - 17170 Tribune St., Granada Hills, CA 91344**
- **Patrick Henry Middle School - 17340 San Jose St., Granada Hills, CA 91344**

- **George Washington Elementary School - 2322 North Lincoln St., Burbank, CA 91504**

(1) Any records or documents<sup>1</sup> pertaining to the practices, safety procedures, construction, maintenance, rebuilding, and/or repair/remodeling work at the locations above, which in any way involved asbestos.

(2) Any records or documents identifying any and all persons, contractors, or other entities who is involved in the practices, safety procedures, construction, maintenance, rebuilding, and/or repair/remodeling work at the locations above, which in any way involved asbestos.

(3) Any records or documents pertaining to any asbestos cleanup work or industrial chemical cleanup work performed at the locations above.

(4) Any records or documents regarding research, investigations, air testing, reports and/or study data from air testing and air sampling which measured the amount of asbestos fiber either in the ambient air and/or released when asbestos was used, machined, operated, or otherwise disturbed at the locations above.

(5) Any records, documents, or letters to or from the Occupational Safety & Health Administration pertaining to warnings, citations, or violations at the locations above, which in any way involved asbestos.

(6) Any records or documents, including but not limited to reports, studies, and/or secondary research provided by the Occupational Safety & Health Administration which addressed the issue of health hazards created by or associated with exposure to asbestos at the locations.

(7) Any written communication from the Occupational Safety & Health Administration at the locations, which in any way involved asbestos.

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<sup>1</sup> The term "record" and the term "document" are used in the broadest sense possible and mean the original and any non-identical copy (e.g., any copy which is different from the original in any way) of any written, recorded, printed, typewritten, or handwritten matter of any kind or nature (however produced, reproduced, or recorded), including but without limitation, all blueprints, work specifications, daily reports, time cards, letters, telegrams, e-mail, facsimiles, memoranda, reports (preliminary and final), studies, samples, testing protocols, diaries, logs, maps, pamphlets, notes, charts, graphs, calendars, schedules, tabulations, analysis, statistical information, accumulations, books, magazines, telephone bills, minutes, summaries, or other records of meetings, conversations, and hearings of any kind, photographs, slides, videotapes, film impressions, data, data compilations, computer files, computer documents, audiotape recordings, magnetic tapes, sound or mechanical reproductions, computer printouts, contracts, drafts of contracts, leases, subleases, instruments, agreements, warnings, directives, instructions, citations, violations, drawings, hearing transcripts, reports, summaries of investigations or negotiations, opinions or reports of consultations, consultants, or proposed experts, and press releases, now or at any time in the Occupational Safety & Health Administration or CA Dept. of Industrial Relations' possession, custody, or control or known or believed by the you to exist or have existed. "Record" or "document" also includes any underlying documents used to create summaries or other reports of financial or other data.

(8) Any records or documents identifying any and all distributors, suppliers, or other entities who sold or otherwise provided asbestos-containing materials for use on the Premises, including but not limited American Asbestos Company and Anchor Equipment Company.

(9) Any records, documents, or letters to or from American Asbestos Company pertaining to warnings, citations, or violations at the locations above, which in any way involved asbestos.

5 USCS § 552(b) allows you to segregate material that is exempt from material that is not exempt. If you determine that some portion of the requested documents is exempt, please provide me with the remainder of the documents. If you determine that some of the documents are exempt from release, please justify withholding of those records by demonstrating that the records are exempt or that the public interest in confidentiality outweighs the public interest in disclosure. We reserve the right to appeal any such determination.

We agree to pay the reasonable costs involved in retrieving and copying the records requested. If there are any fees for searching or copying these records, please inform me if the cost will exceed \$100.00. This information is not being sought for commercial purposes.

5 USCS § 552 requires a response time within twenty (20) business days. If access to the records we are requesting will take longer than this amount of time, please contact me with information about when we might expect copies or the ability to inspect the requested records.

If you deny any or all of this request, please cite each specific exemption you feel justifies the refusal to release the information and notify me of the appeal procedures available to me under the law.

If you have any questions, please feel free to contact me at (213) 486-8026 or by e-mail at [mgiaquinto@hptylaw.com](mailto:mgiaquinto@hptylaw.com).

Sincerely,

**HAWKINS PARNELL**  
**THACKSTON & YOUNG<sup>LLP</sup>**



Michael B. Giaquinto  
*Attorney*